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April 21, 2025

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
Martin Luther King Jr. Courthouse
50 Walnut St.
Room 4040, Courtroom 4C
Newark, NJ 07101

Re: *Kueh v. Shao et al.*
Civil Action No. 2:24-cv-09972-BRM-CLW

Dear Judge Waldor:

We represent Defendant Vivian Wang ("Defendant Wang") in the above-referenced matter. We respectfully write in response to the Court's April 11, 2025 Order (Dkt No. 42), related to the out-of-scope First Amended Complaint filed by Plaintiff (Dkt Nos. 38, 40). The Court's April 11, 2025 Order requires the parties to confer about whether "defendants would consent to those amendments to avoid the time and expense of motion practice...[and]...file a status report letter on or before 4/21/25."

To that end, in the interest of avoiding the time and expense of additional motion practice, Defendant Wang has decided to withdraw her objection to Plaintiff filing the First Amended Complaint. Accordingly, Defendant Wang filed an Answer to the First Amended Complaint on April 18, 2025 (Dkt No. 44). Although, Defendant Wang is withdrawing her objection to the First Amended Complaint, she maintains and is not waiving any defenses. Notwithstanding, Defendant Wang respectfully asks that the Court instruct Plaintiff to properly seek leave of Court for any further amendments as to not prejudice Defendants.

We greatly appreciate the Court's time and attention concerning this matter.



Respectfully submitted,

/s/ Terry D. Johnson
Terry D. Johnson

cc: All counsel of record via ECF

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